

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**MARY LALIBERTE and MARIE MCKNIGHT, individually and as representatives of a class of similarly situated persons, on behalf of the QUANTA SERVICES, INC. 401(K) SAVINGS PLAN,**

**Plaintiffs,**

**V.**

**QUANTA SERVICES, INC.,**

**Defendant.**

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**Case No: 4:22-cv-03290 (AHB)**

## DECLARATION OF CAROLYN CAMPBELL

I, Carolyn Campbell, declare, pursuant to 28 U.S.C. § 1746 and subject to penalties of perjury, as follows:

1. I make this declaration based on my personal knowledge and my review of business records maintained by Quanta Services, Inc. (“Quanta”). If called and sworn as a witness, I would competently testify to these facts.

2. I joined Quanta in 2010, and my current title is Of Counsel. From 2010 until 2023, I served as Deputy General Counsel and Corporate Secretary for Quanta. I have served as a member of the Quanta Services, Inc. 401(k) Savings Plan Committee (“the Committee”), and regularly attended Committee meetings, from 2016 through the present. By virtue of my roles and as a result of my work on the Committee, I am familiar with the documents referenced herein.

**Exhibits to Defendant's Motion for Summary Judgment**

3. Exhibit F to Defendant's Motion for Summary Judgment is a true and correct copy of the February 16, 2021, letter agreement between Quanta and Fidelity Investments ("Fidelity") directing Fidelity to replace the Fidelity Freedom Funds in the Quanta Services, Inc. 401(k) Savings Plan's ("the Plan") investment lineup with the Fidelity Institutional Asset Management Blend Target Date Funds ("FIAM Blend Funds").

4. Exhibit G to Defendant's Motion for Summary Judgment is a true and correct copy of the meeting minutes taken at the 2020 Third Quarter Investment Committee Meeting, held on November 19, 2020.

5. Exhibit J to Defendant's Motion for Summary Judgment is a true and correct copy of the Plan's 2021 Second Quarter 401(k) Investment Review.

**Exhibits to Defendant's Motion to Exclude the Proposed Expert Testimony of Richard Marin ("Motion to Exclude Marin")**

6. Exhibit E to Defendant's Motion to Exclude Marin is a true and correct copy of the Plan's 2015 Investment Policy Statement.

7. Exhibit F to Defendant's Motion to Exclude Marin is a true and correct copy of the Plan's 2016 Fourth Quarter 401(k) Investment Review.

8. Exhibit G to Defendant's Motion to Exclude Marin is a true and correct copy of the Plan's 2017 First Quarter 401(k) Investment Review.

**Exhibits to Defendant's Motion to Exclude the Proposed Expert Testimony of Donald Stone ("Motion to Exclude Stone")**

9. Exhibit E to Defendant's Motion to Exclude Stone is a true and correct copy of the Plan's 2015 Investment Policy Statement.

10. Exhibit F to Defendant's Motion to Exclude Stone is a true and correct copy of the February 16, 2021, letter agreement between Quanta and Fidelity directing Fidelity to replace the Fidelity Freedom Funds in the Plan's investment lineup with the FIAM Blend Funds.


11. Exhibit H to Defendant's Motion to Exclude Stone is a true and correct copy of the meeting minutes taken at the 2016 First Quarter Investment Committee Meeting, held on May 12, 2016.

12. Exhibit I to Defendant's Motion to Exclude Stone is a true and correct copy of the meeting minutes taken at the 2016 Third Quarter Investment Committee Meeting, held on November 18, 2016.

13. Exhibit J to Defendant's Motion to Exclude Stone is a true and correct copy of the meeting minutes taken at the 2016 Fourth Quarter and 2017 First Quarter Investment Committee Meeting, held on May 10, 2017.

I certify under penalty of perjury that the foregoing statements are true and correct to the best of my knowledge.

Dated: December 19, 2024

  
Carolyn Campbell